

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TRUTEK CORP.,

Plaintiff,

v.

YEONG WAN CHO (a.k.a. PETER
CHO, ET AL.,

Defendants.

Civil Action No.: 2:23– cv-3709

Document Electronically Filed

UNOPPOSED MOTION TO INCREASE REPLY PAGE LIMIT

LADDEY, CLARK & RYAN, LLP
Thomas N. Ryan (018951985)
Thomas J. White (320372020)
60 Blue Heron Road, Suite 300
Sparta, New Jersey 07871-2600
Telephone: (973) 729-1880;
Facsimile: (973) 729-1224
tryan@lcrlaw.com
twhite@lcrlaw.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global, Ltd.*

BRADLEY ARANT BOULT CUMMINGS
Jason E. Fortenberry (*pro hac vice*)
Jonathan M. Barnes (*pro hac vice*)
188 East Capitol Street, Suite 1000
Post Office Box 1789
Jackson, Mississippi 39215-1789
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
jfortenberry@bradley.com
jbarnes@bradley.com

Jeffrey D. Dyess (*pro hac vice*)
Benn C. Wilson (*pro hac vice*)
1819 5th Avenue North
Birmingham, Alabama
Telephone: (205) 521-8000
Facsimile: (205) 521-8800
jdyess@bradley.com
bcwilson@bradley.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global, Ltd.*

Defendants Salvacion, USA, Inc., Salvacion Co., LTD., Yeong Wan Cho (aka Peter Cho) and BioSure Global, Ltd. (the “Moving Defendants”) present the following Unopposed Motion to Increase Reply Page Limit by 3 pages, as follows:

1. On July 11, 2023, Plaintiff filed its Complaint.
2. On October 25, 2023, the Moving Defendants served a consolidated motion to dismiss pursuant to the Court’s October 4, 2023 Text Order directing consolidation and submission of the four Moving Defendants’ motions to dismiss.
3. Plaintiff’s deadline to respond to the consolidated motion to dismiss was originally November 8, 2023.
4. The Court granted Plaintiff’s unopposed motion for extension of time to respond to the consolidated motion to dismiss and to increase the response page limit, extending Plaintiff’s deadline 14 days to November 22, 2023 and increasing the response page limit to 48 pages.
5. Plaintiff served its response to the consolidated motion to dismiss on November 22, 2023.
6. The Moving Defendants’ deadline to serve and file a rebuttal brief in support of their consolidated motion to dismiss is currently December 14, 2023.
7. The Moving Defendants respectfully request a 3-page increase to the 15 page limit for a reply brief.

8. Counsel for the Moving Defendants has conferred with Counsel for Plaintiff regarding this motion. Plaintiff does not oppose this motion.

WHEREFORE, the Moving Defendants respectfully request the Court grant this Unopposed Motion to Increase the Reply Page Limit by 3 pages.

Dated: December 8, 2023

Respectfully submitted,

LADDEY, CLARK & RYAN, LLP

BRADLEY ARANT BOULT CUMMINGS LLP

BY: /s/ Thomas J. White

Thomas N. Ryan (018951985)
Thomas J. White (320372020)
60 Blue Heron Road, Suite 300
Sparta, New Jersey 07871-2600
Telephone: (973) 729-1880;
Facsimile: (973) 729-1224
tryan@lcrllaw.com
twhite@lcrllaw.com

Jason E. Fortenberry (*pro hac vice*)
Jonathan M. Barnes (*pro hac vice*)
188 East Capitol Street, Suite 1000
Post Office Box 1789
Jackson, Mississippi 39215-1789
Telephone: (601) 948-8000
Facsimile: (601) 948-3000
jfortenberry@bradley.com
jbarnes@bradley.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global,
Ltd.*

Jeffrey D. Dyess (*pro hac vice*)
Benn C. Wilson (*pro hac vice*)
1819 5th Avenue North
Birmingham, Alabama
Telephone: (205) 521-8000
Facsimile: (205) 521-8800
jdyess@bradley.com
bcwilson@bradley.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.; Yeong
Wan Cho (aka Peter Cho); Salvacion
R&D Center; Salvacion International,
LLC; Sei Young Yun; Biosure Global,
Ltd.*

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that, on this day, the foregoing document was filed with the Clerk of the Court through the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: December 8, 2023

Respectfully submitted,

LADDEY, CLARK & RYAN, LLP

BY: /s/ Thomas J. White

Thomas N. Ryan (018951985)

Thomas J. White (320372020)

60 Blue Heron Road, Suite 300

Sparta, New Jersey 07871-2600

Telephone: (973) 729-1880;

Facsimile: (973) 729-1224

tryan@lcrllaw.com

twhite@lcrllaw.com

*Attorneys for Defendants Salvacion,
USA, Inc.; Salvacion Co., LTD.;
Yeong Wan Cho (aka Peter Cho);
Salvacion R&D Center; Salvacion
International, LLC; Sei Young Yun;
Biosure Global, Ltd.*